

AO 91 (Rev. 11/11) Criminal Complaint

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES DISTRICT COURT

20 FEB 13 PM 2:23

for the
District of New Mexico

CLERK-LAS CRUCES

United States of America

v.

JENNY FREDRICKSON

Case No. 20-528 MJ

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 31, 2019 in the county of Grant in the
District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 USC 111(a)

Assaults, resists, opposes, impede, intimidates, or interferes with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Jean-Lucien Souvenir, U.S Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/13/2020



Judge's signature

City and state: Las Cruces, New Mexico

Gregory Wormuth, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

Affidavit in Support of Criminal Complaint and Arrest Warrant

I, Jean-Lucien Souvenir, having been duly sworn, do depose and state the following;


1. I am a U. S. Postal Inspector with the U.S. Postal Inspection Service (USPIS), currently assigned to the Albuquerque Domicile and have been so employed since July 2019. During that time, I have been trained to work on numerous federal criminal investigations. I have worked with other U.S. Postal Inspectors, police officers, and law enforcement personnel who have extensive criminal investigative experience and training. Prior to my appointment as a U.S. Postal Inspector, I served as a Criminal Investigator with the United States Marshals Service in San Antonio, Texas, for nearly ten years. I also served as a United States Border Patrol Agent in El Paso, Texas, for approximately three years. In my assignment as a U.S. Postal Inspector, I have been tasked to investigate violations of Title 18, United States Code, Sections 111(a) and 1114, Protection of Officers and Employees of the United States, and other related offenses. I have participated and received training relative to criminal investigations involving violent crimes.
2. This affidavit is made for the limited purpose of establishing probable cause that Jenny FREDRICKSON committed offenses in violation of Title 18 USC § 111(a), which states, in part, that whoever forcibly assaults, resists, impedes, intimidates, or interferes with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties shall be guilty of a felony.

3. My knowledge of the facts alleged in this affidavit arises from my training and experience, the collective experience of other U.S. Postal Inspectors, my personal observations, information developed by local law enforcement officers, my discussions with witnesses, and my review of the facts surrounding this criminal matter. This affidavit is limited in scope to the information relevant to show there is sufficient probable cause for the requested warrant and does not set forth all my knowledge regarding this matter.

Facts and Circumstances

4. On September 31, 2019, at approximately 4:00 p.m., J.P., a United States Postal Service (USPS) employee, was assaulted with a BB gun while delivering mail to a community located in the 1400 Block of West Kelly Street, Silver City, New Mexico 88061.
5. J.P. is a USPS Letter Carrier based out of the Silver City Post Office, Silver City, New Mexico, and was on duty delivering U.S. Mail on his assigned route during the incident described in this affidavit.
6. While delivering mail on the 1400 Block of West Kelly Street in Silver City, New Mexico, at the aforementioned time, a woman, later identified as Jenny FREDRICKSON, stood in front of her house located at 1407 West Kelly Street, Silver City, New Mexico, and fired a BB gun at J.P. The projectile did not hit J.P., but struck the Long Life Vehicle (LLV) he was driving.
7. FREDRICKSON was interviewed by U.S. Postal Inspectors Jean-Lucien Souvenir and Benjamin Whip and admitted to pointing the BB gun at the mail carrier. FREDRICKSON also admitted that she subsequently fired the BB gun and hit the door of the LLV J.P. was driving.

8. W.B., FREDRICKSON's cousin, was also interviewed by Postal Inspectors and stated he witnessed the incident. W.B. stated he was with FREDRICKSON when she fired the BB gun at J.P. and told her not to do it. W.B. stated that FREDRICKSON intentionally pointed the BB gun at J.P. and fired it. W.B. also stated that FREDRICKSON was trying to hit J.P., but missed and hit the door of the LLV.
9. FREDRICKSON voluntarily surrendered the BB gun and CO2 Cartridges to Postal Inspectors Jean-Lucien Souvenir and Benjamin Whip.
10. Assistant United States Attorney Matilda McCarthy Villalobos approved prosecution in this matter.
11. Your affiant believes probable cause exists for violations of Title 18, United States Code, Section § 111(a), and § 1114, that is, assaulting, resisting, opposing, impeding, intimidating, or interfering with a federal employee.



Jean-Lucien Souvenir
Postal Inspector, USPIS
Albuquerque, New Mexico

Subscribed and sworn before me this 13th day of February, 2020.



United States Magistrate Judge
District of New Mexico